

Andrea Dobin

From: John FX Fenerty, Jr. <mylawyer@mylawyer.net>
Sent: Thursday, February 20, 2020 2:30 PM
To: Steven Neuner
Cc: Gilbert L. Brooks Esq (gbrooks@duanemorris.com); Andrea Dobin; John F.X. Fenerty, Jr., Esquire (jfxf@MyLawyer.net)
Subject: Re: JOHN COSTANTINO

Good afternoon folks. With regard to the Stipulation which remains in circulation between and among counsel, the child support number has increased given the passage of time and continued lack of payment from Mr. Costantino to \$15,212.06. The Documents will need to be updated accordingly. Please see attached.

Thank you.

COSTANTINO SAMUEL J - 91182674	CS - CHILD S
COSTANTINO SAMUEL J - 91182674	CS - CHILD S
COSTANTINO SAMUEL J - 91182674	CS - CHILD S
COSTANTINO SAMUEL J - 91182674	CS - CHILD
GRASSI NADINE - 91182672	SS - SPOUS

ARREARS TO DATE	
Debt Type	Current Balance Due
CS - CHILD SUPPORT	\$ 15,212.06
SS - SPOUSAL SUPPORT	\$ 43,760.01
Total : \$ 58,972.07	

Hold Code	Hold Code Description	Hold
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John F.X. Fenerty, Jr., Esquire

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Sent from my iPhone

On Feb 18, 2020, at 5:53 PM, Steven Neuner <SNeuner@nv-njlaw.com> wrote:

If you look below you will see an email letter from a Camden County Probation Officer regarding a judgment against the debtor. He contends that the arrears judgment against the debtor (which does not differentiate between child support and non-child support obligations) must be fully paid in order to be satisfied. This is true as far as it goes but is immaterial to the present dispute.

(He mis-cites a case which only holds that the plaintiff can withhold the statutory \$2000 before paying over the amount of child support. Copy attached)

I do not think this is an issue or if it is, it is certainly easily dealt with in our settlement as follows:

1. Debtor and Grassi and Trustee agree that NJSA 2A:17-56.23b only applies to child support arrears, and that the trustee is not obligated under that statute to turn over any additional arrears that do not fit within that definition, as they are not a statutory lien under code section 545. Such arrears may be includible in a claim by Grassi as a Domestic Support Obligation to be paid pursuant to Codes sections 507 and 726.
2. The arrears that remain unpaid at the conclusion of the bankruptcy are still the debtor's non-dischargeable obligation, except to the extent paid or satisfied in the bankruptcy case.
3. The release of the trustee will explicitly include any claims arising under NJSA 2A:17-56.23b.

Steven R. Neuner Esq.

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IF THIS EMAIL CONTAINS INFORMATION ABOUT BANKRUPTCY: please note that we are Bankruptcy Attorneys and assist people in obtaining debt relief through the Bankruptcy Code. Further information can be found at our website

From: Brooks, Gilbert L. <GBrooks@duanemorris.com>
Sent: Tuesday, February 18, 2020 5:12 PM
To: Steven Neuner <sneuner@nv-njlaw.com>
Subject: FW: JOHN COSTANTINO

From: Atwood Shupp <Atwood.Shupp@njcourts.gov>
Sent: Tuesday, February 18, 2020 3:55 PM
To: Brooks, Gilbert L. <GBrooks@duanemorris.com>
Subject: JOHN COSTANTINO

4 PAGES

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<John Costantino Judgment.pdf>
<simpkins v saiani.pdf>